

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

SARAH BAKER) Case No. 1:19-cv-07118
Plaintiff,)
v.) Honorable Judge Manish Shah
CLARITY CLINIC LLC, CLARITY CLINIC) Magistrate Judge
ARLINGTON HEIGHTS, LLC, and PAVAN) Honorable Gabriel A. Fuentes
PRASAD, M.D., individually)
Defendants.)

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Under Rule 26(c) of the Federal Rules of Civil Procedure, the Parties agree it is necessary to have an Agreed Confidentiality Order to preserve the confidentiality of certain documents, information, and testimony to be produced or given by the parties or witnesses. The parties find that certain documents, information, and testimony in this litigation should be kept confidential to protect the parties' legitimate interests and their privacy rights. Since the public disclosure of such information and documents might cause private and confidential information to be disclosed to the detriment of the parties, the parties find that "good cause" – under Rule 26(c) – exists and request that the Court enter the Agreed Confidentiality Order attached as Exhibit 1. This Order is based on the Northern District's Model Order. A version with redline changes to the Model Order is attached as Exhibit 2.

WHEREFORE, the parties request that this Motion for Entry of an Agreed Confidentiality Order be granted.

Dated: March 6, 2020

By: /s/ Amit Bindra
One of the attorneys for Defendants

The Prinz Law Firm, P.C.
Kristen E. Prinz (kprinz@prinz-lawfirm.com)
Amit Bindra (abindra@prinz-lawfirm.com)
1 East Wacker Drive, Suite 2500
Chicago, IL 60601
P: (312) 212-4450
F: (312) 284-4822

By: /s/ Maureen A. Salas (with permission)
One of the attorneys for Plaintiff

Werman Salas P.C.
Maureen A. Salas (msalas@flsalaw.com)
Douglas M. Werman (dwerman@flsalaw.com)
Jacqueline H. Villanueva (jvillanueva@flsa.com)
Sarah J. Arendt (sardent@flsalaw.com)
77 West Washington Street, Suite 1402
Chicago, IL 60602
P: (312) 419-1008
F: (312) 419-1025

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER via the CM/ECF system to the attorneys of record for Plaintiff on March 6, 2020.

Respectfully submitted,

By: /s/ Amit Bindra
One of Defendants' Attorneys

The Prinz Law Firm, P.C.
Kristen E. Prinz (kprinz@prinz-lawfirm.com)
Amit Bindra (abindra@prinz-lawfirm.com)
1 East Wacker Drive, Suite 2500
Chicago, IL 60601
P: (312) 212-4450
F: (312) 284-4822